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January 19, 1987

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U.S. EPA REGION 5
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT SECTION

Ms. Susan Swales
Waste Management Division
US EPA - Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Re: Sites Connected with Steve Martell
Northeast Illinois and Northwest
Indiana

Dear Ms. Swales:

In response to the United States Environmental Protection Agency (U.S. EPA) request regarding the above site, a diligent search of Allis-Chalmers Corporation records provided only the following:

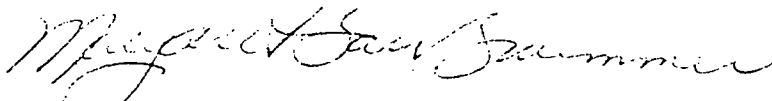
1. Waste hauling manifests involving the Paxton Landfill site and the Allis-Chalmers plant in Harvey, Illinois. The waste haulers, Liquid Dynamics and Dombrowski & Holmes, however, were not among the business organizations listed in the U.S. EPA request. All manifests on record and provided herewith as Exhibit 3 are Part 6 of the State of Illinois Environmental Protection Agency Division of Land Pollution Control Special Waste Hauling Manifest that is completed by the waste generator.
2. Special Liquid Waste Shipment records, load record, invoice, correspondence and purchase order dealing with latex paint and waste water shipments from the Allis-Chalmers plant in LaPorte, Indiana to the Paxton Landfill site. These documents are included as Exhibit 4 hereto.
3. All requested information known to Allis-Chalmers regarding the materials transported in paragraphs 1 and 2 above appears in summary form in Exhibit 1 attached hereto.

4. The names and only known addresses of the waste haulers are shown in Exhibit 2.
5. A listing and summaries (Exhibit 5) and copies (Exhibit 6) of the Company's primary liability insurance policies from 1958 to 1961 and 1969 through 1980. These are the only primary insurance policies in the Company's files. In addition to these primary policies, the Company had a number of excess or umbrella policies that provided coverage for the same events as the primary policies, but provided for higher liability amounts. A listing of these umbrella policies is also included in Exhibit 5. At no time, however, was the Company covered by any environmental impairment liability insurance nor was the routine disposal of hazardous waste covered under the Company's primary or excess insurance policies.
6. Allis-Chalmers has no record of any transactions or correspondence with Messrs David Head or Steve Martell.
7. The daily disposal practices of the Harvey and LaPorte plants are unavailable due to the Company's closing of these facilities.

I respectfully request that the information provided pursuant to this EPA inquiry with respect to the Company's insurance policies and policy limits be treated as confidential business information and have labelled it accordingly.

If you have any questions, please do not hesitate to contact me at the above number.

Very truly yours,



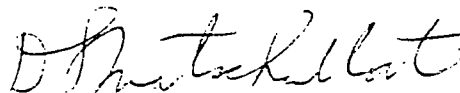
Margaret Barr Bruemmer
Counsel
Corporate Law Department

MBB/pph2803L

VERIFICATION

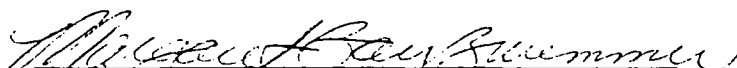
STATE OF WISCONSIN)
)
COUNTY OF MILWAUKEE) ss.

The above responses were prepared with the assistance and advise of counsel. Subject to inadvertent or undisclosed error, the responses are based upon, and therefore, necessarily limited by, the records and information still in existence, presently recollected and thus far discovered in the course of preparing these responses. Allis-Chalmers Corporation ("Allis-Chalmers") reserves the right to make any changes in these responses if it appears at any time that omissions or errors have occurred or that more accurate information is available. Subject to the limitations set forth herein, I certify that, to the best of my knowledge and belief, the above responses are true and accurate.



Dale L. Matschullat
Vice President, General Counsel

Subscribed and sworn to before me
this 19th day of June, 1987
at Milwaukee, Wisconsin.



Notary Public; State of Wisconsin
My commission is permanent.